

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHUANGMA PLASTIC CO., LTD.,

Plaintiff,

v.

CHEF'N CORPORATION and
TUPPERWARE BRANDS CORPORATION,

Defendants.

NO.

**COMPLAINT FOR DECLARATORY
JUDGMENT OF NON-INFRINGEMENT
AND INVALIDITY OF U.S. PATENT NO.
7,264,189 AND FOR VIOLATION OF
LANHAM ACT §43(a), TORTIOUS
INTERFERENCE WITH
CONTRACTUAL AND PROSPECTIVE
BUSINESS RELATIONS AND UNFAIR
COMPETITION**

JURY TRIAL DEMANDED

NATURE OF THE CASE

Plaintiff Shuangma Plastic Co., Ltd. ("Shuangma" or "Plaintiff") seeks a declaratory judgment that it is not infringing any valid patent rights owned by Defendant Chef'n Corporation ("Chef'n Corp.") by Shuangma or its retail customers' sales of the accused manual mini choppers manufactured by Shuangma. The need for such relief exists because Chef'n Corp. and its enforcement agent Defendant Tupperware Brands Corporation ("Tupperware") (collectively "Defendants") have wrongfully accused Shuangma and its retail customers of patent infringement causing the improper delisting of the accused manual mini choppers sold

1 by several of Shuangma's retail customers on Amazon.com. Shuangma also seeks relief for
2 violation of the Lanham Act §43(a), tortious interference with contractual relations and
3 prospective business relations and unfair competition based on Defendants' false and
4 misleading statements with at least Amazon.com and Shuangma's retail customers that
5 wrongfully accuse Shuangma and its retail customers' sales of the accused manual mini
6 choppers of infringing Chef'n Corp's patent rights.
7

8 THE PARTIES

9 1. Shuangma is a Chinese company organized and existing under the laws of the
10 People's Republic of China with a principal place of business located at Shangjin Village,
11 Yanjiang Town, Linhai, Taizhou City, Zhengjiang Province, People's Republic of China,
12 317022.
13

14 2. Upon information and belief, Chef'n Corp. is a Washington corporation with its
15 principal place of business at 830 Fourth Avenue South, Suite 400, Seattle, Washington 98134-
16 1337.
17

18 3. Upon information and belief, Tupperware is a Delaware corporation with its
19 principal place of business at 14901 South Orange Blossom Trail, Orlando, Florida 32837-
20 6600.
21

22 4. Upon information and belief, Chef'n Corp. is the owner by assignment of all
23 rights, title and interest in and under U.S. Patent No. 7,264,189 ("the '189 patent"), entitled
24 "Hand-Held Food Processor," which is attached as Exhibit 1.
25

26 5. Upon information and belief, Tupperware is the enforcement agent of Chef'n
Corp. for the '189 patent.

6.

JURISDICTION AND VENUE

7. The Court has subject matter jurisdiction over the claims, because they arise under the Federal Declaratory Judgement Act, Title 28 U.S.C. §§ 2201 and 2202, and under Title 28, U.S.C. §§ 1331 and 1338(a).

8. The Court has personal jurisdiction over Chef'n Corp., because Chef'n Corp. has a principal place of business in this judicial district, and under 28 U.S.C. § 1391(b)(2), because a substantial part of the events or omissions giving rise to the claims asserted herein occurred in this district.

9. This Court has personal jurisdiction over Tupperware under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims asserted herein occurred in this district.

10. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)-(d) and 1400(b).

FACTUAL BACKGROUND

11. Shuangma is a leading designer and manufacturer of numerous household plastic products, including food processors, onion choppers, salad spinners, spice sets, graters, storage bins for refrigerated products and many other household products, including the accused manual mini choppers. Shuangma's U.S. retail customers for the imported accused manual mini choppers manufactured by Shuangma include Brieftons, Goodhope, TOPULORS, Vinipiak, Shenzhen Leiteng Company and Shenzhen Leiteng Company who sell the products through major retail outlets such as Amazon, Walmart, Aldi, Lidl, Metro, Target, Avon and/or K-Mart.

12. On information and belief, in response to the increasing popularity of Shuangma's accused manual mini choppers, Chef'n Corp.'s enforcement agent Tupperware

Brand Enforcement Team (tupperware.enforcement@incoproip.com) began contacting at least Amazon.com lodging complaints that the accused manual mini choppers sold by Shuangma's retail customers Brieftons, Goodhope, TOPULORS, Vinipiak, Shenzhen Leiteng Company and Shenzhen Leiteng Company infringe Chef'n Corp.'s '189 patent.

13. Specifically, on information and belief, Chef'n Corp.'s enforcement agent Tupperware sent one or more complaints to Amazon.com to delist the following accused manual mini choppers (identified by ASIN #) manufactured by Shuangma for each of its retail customers Brieftons, Goodhope, TOPULORS LLC, Vinipiak, Shenzhen Leiteng Company and Shenzhen Yiling Company, based on the wrongful accusation that such accused manual mini choppers infringe Chef'n Corp.'s '189 patent. The most recent Complaint numbers and ASIN ##s are identified below:

Tupperware Complaint No. 7183221971/Brieftons ASIN ##s:

B01M0DZ54H, B0791GWSXR, B0773LVQL2, B0788JBXMQ, B01KFD4HG4, B01N53TLAW, B01LYCJEJS, B079Q2NT69, B076Y86MTT, B004QGXND0, B010D4XVNK, B01ABXL6B2, B078NNH4F7, B01N1U8BOC, B06WRSW7JF, B010VDS8K4, B074C3ZCMF, B01M0WRAT3, B078NN61QW, B01LZB6YBD, B0772PC53W, B00X66IP2K, B076P63SK5, B00TJ6BDA2, B0772Y4CDT, B073RRPM52, B0001VQII6, B004RZEPYQ, B078WDNFFL, B01GQT6UJS, B075VBZ4G2, B076HZYFJD, B07BDCVGX7, B00UZEZ196, B073B64GBS, B072546F8Q, B0788GJ8S6, B01M0AFML9, B06XPCYPNQ, B074JBB99H, B01N9NM6NR, B01LWYDEQ7, B078NPG4MT, B06XPHY6R6, B014WCNTOU, B076Y5DJN8, B00CQFMR12, B01N9JISYB, B078NN5PXF, B00T8O6B1Q;

Tupperware Complaint No. 7183221971/Goodhope ASIN ##s:

B01M0DZ54H, B0791GWSXR, B0773LVQL2, B0788JBXMQ, B01KFD4HG4, B01N53TLAW, B01LYCJEJS, B079Q2NT69, B076Y86MTT, B004QGXND0, B010D4XVNK, B01ABXL6B2, B078NNH4F7, B01N1U8BOC, B06WRSW7JF, B010VDS8K4,

1 B074C3ZCMF, B01M0WRAT3, B078NN61QW, B01LZB6YBD, B0772PC53W,
 2 B00X66IP2K, B076P63SK5, B00TJ6BDA2, B0772Y4CDT, B073RRPM52, B0001VQII6,
 3 B004RZEPYQ, B078WDNFFL, B01GQT6UJS, B075VBZ4G2, B076HZYFJD,
 4 B07BDCVGX7, B00UZEZ196, B073B64GBS, B072546F8Q, B0788GJ8S6, B01M0AFML9,
 5 B06XPCYPNQ, B074JBB99H, B01N9NM6NR, B01LWYDEQ7, B078NPG4MT,
 6 B06XPHY6R6, B014WCNTOU, B076Y5DJN8, B00CQFMR12, B01N9JISYB,
 7 B078NN5PXF, B00T8O6B1Q;

8 **Tupperware Complaint No. 7246074461/TOPULORS ASIN ##s:** B085S583H4,
 9 B0769QDFTX, B082MYQG43, B07C152C9X, B086K37KYD, B0829SMB1R, B084ZCN3H3,
 10 B084H18D5V, B084YXBRV1, B0851PJ2CS, B086WBQLY2, B07XL6FJXF, B07CCH7KSR,
 11 B07NY1763C, B071FKQ713, B081N4XBVL, B083NJJ42L, B0871FDJ6Y, B082KFGM7B,
 12 B086PC2R24, B08664R5NT, B07TM459HV, B082594PZQ, B07TM9VL19, B085QJWS9K,
 13 B086S972ND, B085DG4H42, B0792HZT7Q, B07TT4LCRV, B002PW9TD0, B086QLXKTG,
 14 B07DPN93LQ, B07RL257G3, B07KP8RGPW, B0821MMFH3, B07BDPTC9R,
 15 B07XM7FH6D, B07CBMBSM7, B08393MK2J, B085X7TQKP, B084Z5HSLK,
 16 B07VJN7M51, B07B4BKY4N, B081N4LFSJ, B07Y8DRPKC, B07VLR2LCP,
 17 B0855DNMX6, B07D9KSF3T, B01N9G0CDR;

18 **Tupperware Complaint No. 7183221971/Vinipiak ASIN ##s:** B01M0DZ54H,
 19 B0791GWSXR, B0773LVQL2, B0788JBXMQ, B01KFD4HG4, B01N53TLAW,
 20 B01LYCJEJS, B079Q2NT69, B076Y86MTT, B004QGXND0, B010D4XVNK,
 21 B01ABXL6B2, B078NNH4F7, B01N1U8BOC, B06WRSW7JF, B010VDS8K4,
 22 B074C3ZCMF, B01M0WRAT3, B078NN61QW, B01LZB6YBD, B0772PC53W,
 23 B00X66IP2K, B076P63SK5, B00TJ6BDA2, B0772Y4CDT, B073RRPM52, B0001VQII6,
 24 B004RZEPYQ, B078WDNFFL, B01GQT6UJS, B075VBZ4G2, B076HZYFJD,
 25 B07BDCVGX7, B00UZEZ196, B073B64GBS, B072546F8Q, B0788GJ8S6, B01M0AFML9,
 26 B06XPCYPNQ, B074JBB99H, B01N9NM6NR, B01LWYDEQ7, B078NPG4MT,

B06XPHY6R6, B014WCNTOU, B076Y5DJN8, B00CQFMR12, B01N9JISYB,
B078NN5PXF, B00T8O6B1Q;

Tupperware Complaint No. 7246074461/Shenzhen Leiteng Company ASIN #s:

B085S583H4, B0769QDFTX, B082MYQG43, B07C152C9X, B086K37KYD, B0829SMB1R,
B084ZCN3H3, B084H18D5V, B084YXBRV1, B0851PJ2CS, B086WBQLY2, B07XL6FJXF,
B07CCH7KSR, B07NY1763C, B071FKQ713, B081N4XBVL, B083NJJ42L, B0871FDJ6Y,
B082KFGM7B, B086PC2R24, B08664R5NT, B07TM459HV, B082594PZQ, B07TM9VL19,
B085QJWS9K, B086S972ND, B085DG4H42, B0792HZT7Q, B07TT4LCRV, B002PW9TD0,
B086QLXKTG, B07DPN93LQ, B07RL257G3, B07KP8RGPW, B0821MMFH3,
B07BDPTC9R, B07XM7FH6D, B07CBMBSM7, B08393MK2J, B085X7TQKP,
B084Z5HSLK, B07VJN7M51, B07B4BKY4N, B081N4LFSJ, B07Y8DRPKC, B07VLR2LCP,
B0855DNMX6, B07D9KSF3T, B01N9G0CDR; and

Tupperware Complaint No. 7183161871/Shenzhen Leiteng Company ASIN #s:

B07R2BZ97D, B07PYRC764, B07QDHNDJV, B07R2BXDTB, B07PYTMJC3, B07R298RQL, B
07QKYTW27, B07PYTX4JS, B07PZTS8FH, B07R5W8CJ6, B07QKSVRKM, B07S99W9NG, B
07Q24M1X7, B07RGXZ1PN, B07SZCG8QZ, B07Q8GHRPC, B07QD6JHMY, B07SQ59NM9, B
07PN29MGS, B07PYRL7PW, B07RDNY9WR, B07RHSYV82, B07NZLX8HW, B07PYSVSPT,
B07PVN95C6, B07PQCZPH5, B07Q22S219, B07Q22NRT6, B07Q3L7LRH, B07PDYFV4K, B0
7QQ9LD8J, B07PYVCJ7F, B07PWWYQKW, B07PBFL7QS, B07PMSMTL9, B07S8483ZF, B07
PLPV325, B07R99F95M, B07R4XVL1M, B07SZCTC2G, B07PYT8CHM, B07SPR5MQS, B07P
Y7JNR5, B07S6QKJVV, B07QKTZTCD, B07SCL4127, B07R8JFKWN, B07Q8F87DB, B07RH
YNY9K, B07QJ38DD7.

14. On information and belief, Amazon.com requested each retail customer to
contact and work directly with Tupperware to resolve the dispute. At least Brieftons,
Goodhope, TOPULORS and Vinipiak have contacted Tupperware. Notwithstanding their
communications with Tupperware and/or Amazon.com, at least the following accused manual

mini choppers sold by each customer retailer remain delisted by Amazon.com: **Brieftons** ASIN ##s B00T8O6B1Q and B010VDS8K4; **Goodhope** ASIN # B0791GWSXR; **TOPULORS** ASIN ##s B01KFD4HG4, B01M0WRAT3, B01N9JISYB, B01N1U8BOC and B06WRSW7JF, B01MTX7432 and B01N9G0CDR; **Vinipiak** ASIN ##s B07S3YK9KX, B06XPDTVZQ and B06XPCYPNQ; **Shenzhen Leiteng Company** ASIN ##s B089QD8MPW, B07RL257G3, B07RHSYV82, B07XBYW1NM, B07HGZWW8L, B07FDVL3ZS, B07FDYYYKM, B0769QDFTX, B07YWTYD2V, B07YWTRFFM, B07YWTGBL3, B07YWRHS8X, B07YWQPS7V, B07WMT5BR7, B07SZCTC2G, B07SZCG8QZ, B07D9KHXH9, B086TYCNDB, B084ZCN3H3, B089PZ4ZN5; and **Shenzhen Yiling Company** ASIN ##s B07PYRL7PW and B07PYRC764.

15. On information and belief, in response to the accusations by Tupperware, at least Vinipiak informed Amazon.com that it has reached agreement with Chef-n Corp. for production and sales and is negotiating with Chef-n Corp. now. Vinipiak informed Amazon.com that it has stopped selling the accused products and stopped replenishing the Amazon.com warehouse.

16. A justiciable controversy exists as to whether Shuangma's accused manual mini choppers manufactured by Shuangma and sold by its retail customers infringe any valid claim of the '189 patent owned by Chef-n Corp.

17. Shuangma's accused manual mini choppers, including the manual mini choppers identified by the above-identified ASIN numbers manufactured by Shuangma and sold by its retail customers, do not infringe any valid patent rights owned by Chef-n Corp., including any valid claim of the '189 patent. Accordingly, Shuangma respectfully requests that the Court issue a declaratory judgment confirming that Shuangma is not infringing any Chef-n Corp. patent rights as a result of the manufacture and sale of the accused manual mini choppers, including any valid patent claims of the '189 patent and that the claims of the '189 patent are

1 invalid under 35 U.S.C. §§ 102, 103 and/or 112.

2 **COUNT ONE**

3
4 **REQUEST FOR DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF**
5 **U.S. PATENT NO. 7,164,189**

6 18. Shuangma repeats and realleges paragraphs 1 through 16 above as if fully
7 set forth herein.

8 19. Shuangma's accused manual mini choppers do not infringe any valid claim
9 of U.S. Patent No. 7,265,189 ("the '189 patent"). The manufacture, use, sale, offer for sale
10 and/or importation of Shuangma's accused manual mini choppers do not infringe any claims of
11 the '189 patent because the accused mini choppers do not include at least "a cup for holding the
12 food to be processed and having a rotatable drive shaft" required by independent Claim 1 and
13 dependent Claims 2 through 18, which require the same limitation by virtue of their
14 dependency from Claim 1; "an end surface, further including a long rib on said end surface"
15 and "a stop block on the sidewall for interrupting the free spinning rotation of food in the cup"
16 required by independent Claim 20 and dependent Claims 21 through 33, which require the
17 same limitations by virtue of their dependency from Claim 20; and "a stop block on the
18 sidewall for interrupting the free spinning rotation of food in the cup" required by independent
19 Claim 34 of the '189 patent.

20 20. Shuangma is entitled to a declaratory judgment that it has not infringed any
21 claims of the '189 patent.

22 **COUNT TWO**

23 **REQUEST FOR DECLARATORY JUDGMENT OF INVALIDITY OF U.S.**
24 **PATENT NO. 7,164,189**

25 21. Shuangma repeats and realleges paragraphs 1 through 19 above as if fully
26 set forth herein.

VIOLATION OF LANHAM ACT §43(a)

24. Defendants or their agents are making false and misleading statements in communications with at least Amazon.com and Shuangma's retail customers about Shuangma's accused manual mini choppers that are in commerce in the United States.

25. The false and misleading statements deceived both Amazon.com and Shuangma's retail customers and influenced their decisions to purchase and/or sell Shuangma's accused manual mini choppers.

26. The false and misleading statements have harmed or are likely to cause significant economic harm to Shuangma and damage its reputation.

27. Shuangma is entitled to damages and injunctive relief as provided for by the law, including treble damages.

**WASHINGTON CONSUMER PROTECTION ACT, RCW 19.86, AND
COMMON LAW UNFAIR COMPETITION**

28. Shuangma repeats and realleges paragraphs 1 through 26 above as if fully set forth herein.

29. Defendants' misconduct as alleged herein constitutes unfair and unlawful

1 competition and/or unfair business practices in violation of the Washington Consumer
 2 Protection Act, RCW 19.86 and the common law of the State of Washington, because
 3 Defendants or their agents have made false and misleading statements to at least Amazon.com
 4 and Shuangma's retail customers about Shuangma's accused manual mini choppers in
 5 commerce in the United States.

6 30. The false and misleading statements in communications with at least
 7 Amazon.com and Shuangma's retail customers has deceived Amazon.com and Shuangma's
 8 retail customers and influenced their decisions to purchase and/or sell Shuangma's accused
 9 manual mini choppers.

10 31. Shuangma is informed and believes, and therefore alleges, that Defendants
 11 or their agents continue these unfair practices to this day.

12 32. As a direct, proximate, and foreseeable result of Defendants' unfair business
 13 practices, Shuangma has suffered or is likely to suffer significant economic damages and
 14 damage to its reputation.

15 33. Shuangma is informed and believes, and therefore alleges, that Defendants
 16 or their agents will continue to harm Shuangma by making false representations about
 17 Shuangma's accused manual mini choppers unless and until the Court orders Defendants to
 18 cease and desist.

19 **COUNT FIVE**

20 **TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS**

21 34. Shuangma repeats and realleges paragraphs 1 through 32 above as if fully
 22 set forth herein.

23 35. Defendants' complaints to Amazon.com and Shuangma's retail customers
 24 made with the knowledge that the asserted '189 patent is invalid and/or not infringed, are bad
 25 faith representations vitiating the patent law preemption that would bar liability under state law
 26

1 unfair competition and related tort claims.

2 36. At the time Defendants made these misrepresentations, they were aware that
3 Shuangma has a valid contractual relationship with Amazon.com and/or with one or more of
4 Shuangma's retail customers.

5 37. Defendants' misrepresentations were an intentional and unjustifiable attempt
6 to induce Amazon.com and/or one or more of Shuangma's retail customers to breach or disrupt
7 their contractual relationship with Shuangma by, in the case of Amazon.com, delisting the
8 accused manual mini choppers manufactured by Shuangma and sold by its retail customers
9 Brieftons, Goodhope, TOPULORS, Vinipiak, Shenzhen Leiteng Company and Shenzhen
10 Leiteng Company, and by, in the case of at least retail customer Vinipiak, cause Vinipiak to
11 stop selling the accused products, reach agreement with Chef-n Corp. for production and sales
12 and negotiate with Chef'n Corp. now.

13 38. Shuangma has incurred and will incur significant economic costs and
14 damage to its reputation as a direct result of Amazon.com's delisting the accused manual mini
15 choppers manufactured by Shuangma and sold by its retail customers Brieftons, Goodhope,
16 TOPULORS, Vinipiak, Shenzhen Leiteng Company and Shenzhen Leiteng Company and by
17 one or more of its retail customers choosing to stop selling the accused products and/or switch
18 to Chef-n Corp. for production and sales.

19 39. Shuangma is entitled to recover compensatory and punitive damages.

20 **COUNT SIX**

21 **TORTIOUS INTERFERENCE WITH PROSPECTIVE BUSINESS RELATIONS**

22 40. Shuangma repeats and realleges paragraphs 1 through 38 above as if fully
23 set forth herein.

24 41. Defendants' complaints to Amazon.com and Shuangma's retail customers,
25 made with the knowledge that the asserted '189 patent is invalid and/or not infringed, are bad
26

1 faith representations vitiating the patent law preemption that would bar liability under state
2 unfair competition and related tort claims.

3 42. At the time, Defendants made these misrepresentations, they were aware
4 Shuangma had an ongoing business relationship and there was a reasonable probability
5 Shuangma would have continued business relations with Amazon.com and Shuangma's retail
6 customers.

7 43. Defendants' misrepresentations were an intentional and unjustifiable attempt
8 to induce Amazon.com and Shuangma's retail customers to disrupt their business relationships
9 and knew the misrepresentations were certain or substantially certain to disrupt Shuangma's
10 business relations with Amazon.com and cause Amazon.com to delist the accused manual mini
11 choppers manufactured by Shuangma and sold by its retail customers Brieftons, Goodhope,
12 TOPULORS, Vinipiak, Shenzhen Leiteng Company and Shenzhen Leiteng Company and one
13 or more of its retail customers to choose to stop selling the accused products and/or switch to
14 Chef-n Corp. for production and sales.

15 44. Shuangma has incurred and will incur significant economic costs and
16 damage to its reputation as a result of Defendants' misrepresentations and causing
17 Amazon.com to delist the accused manual mini choppers manufactured by Shuangma and sold
18 by its retail customers Brieftons, Goodhope, TOPULORS, Vinipiak, Shenzhen Leiteng
19 Company and Shenzhen Leiteng Company and one or more of its retail customers to choose to
20 stop selling the accused products and/or switch to Chef-n Corp. for production and sales.

21 45. Shuangma is entitled to recover compensatory and punitive damages.

22 **REQUEST FOR RELIEF**

23 Shuangma seeks the following relief:

24 1. A declaratory judgment that it is not infringing any of Chef'n Corporation's
25 patent rights, including any valid claim of U.S. Patent No. 7,264,189;

2. A declaratory judgment that the claims of U.S. Patent No. 7,264,189 are invalid under 35 U.S.C. §§ 102, 103 and/or 112;

3. A permanent injunction enjoining Defendants, their successors and assigns, and anyone acting in concert therewith or on their behalf, from asserting to Shuangma, Shuangma's retailer customers, Amazon.com or any other retailers or customers of Shuangma's manual mini choppers, or any of their parents, affiliates, or subsidiaries, as well as their respective officers, agents, employees, successors, and assigns, that Shuangma's or its retailer customers' sales of such products infringe Chef'n Corporation's patent rights, including U.S. Patent No. 7,264,189;

4. A permanent injunction enjoining Defendants, their successors and assigns, and anyone acting in concert therewith or on their behalf, from attempting to enforce the '189 patent against Shuangma, Shuangma's retailer customers, Amazon.com or any other retailers or customers of Shuangma's manual mini choppers, or any of their parents, affiliates, or subsidiaries, as well as their respective officers, agents, employees, successors, and assigns;

5. An award to Shuangma of compensatory damages and treble damages as provided by law;

6. Disgorgement of the revenues or profits obtained by Defendants as a result of Defendants' misconduct;

7. Injunctive and other equitable relief requiring Defendants to take all necessary steps (a) to prevent further misrepresentations by Defendants and any agents acting on their behalf, including but not limited to the misrepresentations to Amazon.com and/or Shuangma's retailer customers identified in Counts III through VI above; (b) to correct any and all such misrepresentations already made; and (c) to prevent further harm to Shuangma as a result of Defendants' misconduct;

8. For an award to Shuangma of its reasonable attorneys' fees and costs pursuant to 35 U.S.C. § 285 or as otherwise permitted by law; and

9. For such other and further relief that the Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Shuangma hereby demands a trial by jury on all issues that are triable of right to a jury in this action.

DATED this 30th day of October, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record on October 30th, 2020 via the Court's ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Ben Hodges